

Introduction

Scandinavia is the area where trust in political institutions and the role of the state is greatest in the world. Political actors in all three Scandinavian countries now compete for the honour of having created and developed the welfare state. It is such a central part of their self-understanding that this political framework can be said to have become a part of the Scandinavian national concept.

Thus, modern nation-building in Scandinavia inescapably represents a play with the welfare state centre stage. In the post Second World War era, nationals were to have been included in society through social rights and to have become full citizens of the modern nation-state. On the other hand, the nation-state should be strengthened through the eradication of social injustice. The Scandinavian welfare model has developed as a dialectical project, shaped by and giving shape to central societal forces—first and foremost, the so-called class compromise,^[1] later the gender issue, and after the beginning of the 1970s, the significant challenge of ethnic diversity. The national ideology production attached to the welfare state has become both means and end: National cohesion was a precondition for the development of the welfare-state project; it was also a consequence, a continuous benefit of the expanding welfare regime.

I will, in this article, briefly spell out the centrality (historically speaking) of the welfare state for understanding modern immigration policies and debating social cohesion in today's Scandinavia. Yet its three traditionally homogeneous countries still strive to come to terms with nation-building in a multicultural setting. I claim that, practically speaking, these three welfare states continue to be the central nation-builders on the ground, even though the ideology production has become ambiguous and confused and differs significantly throughout the region.

The historical account

The People's Home (*Folkhemmet*) was a term coined by the Social Democrats for a key concept in Sweden before the Second World War. A grand class alliance should replace the past class struggle to steer society towards a socialist goal.[2] 'The integrative idea of the "folkhemmet", in which society was organized as a family, with the home as a metaphor, subordinated class struggle to national welfare'.[3] This compelling concept, which in fact was appropriated from the conservatives, was effectively used as an instrument for modernization, using society, rather than the individual, as the basic building block.

Similar tendencies were prevalent in Denmark and Norway in the same period. *Folk* turned out to be a politically attractive concept in these countries too: *Folkefællesskabet* (the people's community) in Denmark and *Hele folket i arbeid!* (All the people to work!) in Norway. *Folk* and *nation* were closely intertwined, particularly in Norway and Sweden. According to Swedish historian Bo Stråth, legitimacy for this broad plea for popular mobilization was based on a combination of the national issue and a specific *protestant ethic* that prevailed in popular movements. This ethic was marked by a pietistic value orientation that emphasised both individual freedom and radical claims of equality.[4] Pietism and duty often go hand in hand. Accordingly, the twin metaphors of home and people indicated, through their *collective* connotations, the sacrifices expected of the individual in return for social security.

Historically, *rights* and *duties* have been closely intertwined; they epitomised the labour movement's twentieth-century slogan: Do your duty, claim your rights! (*Gjør din plikt, krev din rett!*).[5] In essence, this dual prescription is a narrative of the relationship between the collective and the individual. The collective bestows certain duties upon the individual for the benefit of the group. In return, the individual is reaffirmed by the collective, strengthened in his or her bonds to the group, and given the possibility of acquiring goods or rights. This dynamic applies fundamentally to civil society and to the realm of the state. In Scandinavia, the dialectics between rights and duties can be seen as the core philosophy of the welfare state, and because the distinctions between state and civil society have been blurred, the rights-duties complex constitutes an ideological pillar of society *as such*.

This complex (which is known in most societies in one way or another) may have acquired its specific nature in Scandinavia through its association with social and cultural *homogeneity*. In the first half of the twentieth century, a homogenisation process that included a rather forceful intentional streamlining of the few existing minorities had taken place in the Scandinavian populations, notably in Sweden and Norway.[6] The new welfare state should be built by individuals, who were liberated from old collectives and bonds, ready to enter a new (perhaps paradoxical) fusion of modern individualism and a new sense of societal responsibility. This general homogenisation (or *assimilation*) is usually seen as a precondition for the development of the specific Nordic brand of the welfare state and for its continued support and legitimacy.[7] This process was probably facilitated by the *small* populations of all three Scandinavian countries.

The combination of this rights–duties complex and pronounced homogeneity has forged societies marked by the conformity pressure so distinctly epitomised in Danish-Norwegian novelist Axel Sandemose’s term *Janteloven* (the law of Jante): ‘Thou shalt not presume that thou art anyone; Thou shalt not presume that thou art as good as us; Thou shalt not presume that thou art more than us’. Globalisation, individualization and pluralisation, traits that marked the past decades in Scandinavia, have reduced this societal grip on people. However, when the ‘new immigrants’[8] started arriving in the 1960s and early 1970s and new policies were expanded to accommodate the consequent cultural pluralism, this pressure to conform definitely still existed. *Ensretting* (a deliberate strategy from above to streamline behaviour) was, in fact, a generic term in Scandinavia that was targeted by the new political left.

Freedom of choice in the land of universal solutions[9]

Given this background, how could *freedom of choice* become such a key concept when

Sweden, a pioneer country in the North, formed its policies for integrating immigrants? Freedom of choice was never really a prominent characteristic of the social-democratic welfare tradition during the period referred to by Gösta Esping-Andersen as the 'Golden Age of Social Democracy'[10] (from 1945 to 1970) and Sweden probably occupied the extreme ends on the scales of central planning and administrative zeal. Given a choice between freedom and equality, equality was invariably chosen. Standard solutions of high quality had become a distinguishing characteristic of the Swedish welfare state, an approach which was possible in a country where the citizens gave massive support to centrally prescribed models, based on the belief that only a strong and centralized state could provide guarantees for the equality and fairness desired,[11] using universal solutions financed by taxation. Moreover, this project to establish equality addresses not only rights and economic redistribution: The Swedish state's administrative zeal penetrated far beyond what was perceived as legitimate or desirable in other Western European states, even into the private sphere. In the name of good intentions, the state wanted to guide child-rearing practices, the relationship between spouses, tastes, and the way of life in general. Politician-spouses Alva and Gunnar Myrdal played a key role during the pre-war formative years of 'social engineering'. 'Bad habits must be put right', Gunnar Myrdal stated. 'Consumption needs to be directed [...] People must be accustomed to brushing their teeth and eating tomatoes'. He was not alien to the idea of guiding decoration and renovation of homes—or turning to coercion as a last resort.[12] Yvonne Hirdman refers to these early social engineers as the 'interior decorators of the People's Home'.

Norway and Denmark were somewhat less zealous than Sweden, although guiding behaviour through social policies was prominent in these countries, too. It is notable that Sweden, where social engineering had proceeded the furthest, also became a pioneer in multicultural liberalism: Immigrants could choose to retain their culture and their private sphere undisturbed.

How this has turned out in practice is a recurring topic of debate in all three countries, but Sweden was definitely the ideological trendsetter during the early phase of Nordic

integration-policy history. In the early 1970s, when the new immigration was starting to be felt more markedly in Denmark and Norway, Sweden had already had multicultural immigration for several years and consequently possessed experience from which the other countries could benefit.

Integration ideology was divided into three components, *equality*, *freedom of choice* and *cooperation*; through freedom of choice, it achieved the characteristic of *exception* for a distinctive group, the immigrants. Thus, even though Swedish scholars ascertain that concerns for equality lie at the base of freedom of choice—that newcomers should be provided with real opportunities to preserve their language and culture in the same manner as the majority population—it is hard to skirt the fact that opting out of the standard solutions offered in homogenous Sweden would serve to emphasise ‘otherness’. Freedom of choice constituted a concession to those who were so different that they could not be expected to adapt to the universal solutions, and this would unavoidably emphasise their position as outsiders.[13]

This apparent oxymoron was accepted as a formative premise by Denmark and Norway, too, where it still constitutes the nerve centre of the integration policy: How should the welfare state’s requirement of universal solutions and equal treatment be reconciled with minority rights and cultural diversity?

In earlier times, receiving countries could wait for things to settle down. Newcomers slowly adapted to their new conditions and in due course (at least after two or three generations) came to be much like their new home country’s population. They changed their way of living, in the manner exemplified by the United States, as they were slowly included through work and social processes. Historically, immigrants in Scandinavia were, in fact, gradually assimilated or were actively pressured into adopting the majority’s way of life, as was the case with some of the Nordic minorities.[14] But modern welfare states *do not have time to*

let history do the job; they cannot risk, even for a short time, minorities and individual immigrants remaining outside the labour market and suffering deprivation, possibly leading to negative 'social inheritance' rather than mobility over generations. Nor do they possess the political legitimacy to pressure anyone too strongly to *become like the majority* overnight.

The *integration policy* approach consequently became a compromise between equality and pluralism: free choice culturally combined with full access to social citizenship.

The logic of immigration policy in welfare states

Scandinavian post-war history can fruitfully be understood in terms of an expanding welfare state and the gradual increase in citizens' and residents' rights. 'The Nordic welfare state' or 'Nordic model' has been established as an internationally distinctive entity. Scandinavia represents a particular type of welfare state, one characterized by institutionalised social rights, universal access, generous benefits, a high degree of public involvement, and comparatively high levels of redistribution, and important in this context, it is by and large tax based. Income security has been fundamental, in the form of *social assistance* and as *social insurance*. This system, designed to constitute a basic safety net for all citizens from cradle to grave, has been remarkably generous—and thereby costly. The basic idea of the welfare state is economic redistribution to diminish social inequality, and a high degree of social and economic equality is considered necessary for the creation of social cohesion and stability. This implies that integration and equality are linked. *Equal treatment* is a key element in the system and *legal residency* is the only criterion for accessing the basic income-security system. Even newcomers are entitled from day one to benefit from the universal goods of the welfare state, provided they have a legal status.

The universalistically oriented Scandinavian welfare state with its tradition for regulation, large public sector, economic transfers to weak groups, and principle of equal treatment has, in practice, had two central implications in relation to the 'new immigration': controlling inflow and integration policy. First, controlling inflow into a country, the first gateway to the territory, has been seen as a prerequisite for maintaining the specificities of the system. The generous welfare model, which embraces everyone but which can be undermined by excessive burdens, needs selection and delimitation of potential new members from elsewhere. This logic has been reemphasised along with the expansion of rights in the country. The more rights, the more caution. And caution has been manifested both in the form of blunt *border control*, increasingly via differentiation through *categories*.^[15] Different categories of immigrants (distinguished partly by their motives for immigration) are given different residence statuses, which activate different sets of rights and different scopes of public expenditure. The juxtaposition of access control and extension of rights creates the basic tension between generous welfare structures and immigration; the welfare state is to be universal, but only within its marked confines.

Second, the emphasis on equality, state management and welfare rights has had a logical corollary in the *integration* policy. If this policy framework is to be maintained, new, legally accepted inhabitants must be made a part of it. Good welfare states do not tolerate substantial numbers of persons or groups that fall by the wayside, disturb the regulated world of work, and burden social budgets. This reflects a basic recognition that society cannot function smoothly if a large section of the population is marginalized and socially excluded. Besides, organized labour has played a central part in politics and has, to a larger extent than elsewhere, contributed to a regulated labour market. This has had specific consequences for advanced welfare states, where an orderly labour regime is one of the basic preconditions for the operation and maintenance of the system. The labour unions has opposed any generation of a reserve army of cheap labour that might be inclined to undermine achieved standards in working life. Consequently, in addition to the liberal humanitarian principles, there are important systemic considerations behind the Scandinavian integration policies.

Governing immigration

The three countries actively curtailed labour immigration in the early 1970s, and the immigrant categories who were allowed entry turned out to be most costly for the welfare state, because they came for humanitarian reasons and were not demand-driven. The people in these categories were also perceived as 'culturally distant'.

Immigration in the region developed into a specific field of governance, more so in Sweden and Norway than in Denmark. When people arrived and established themselves legally, the principle of equal treatment called for the same economic instruments as those applied to the majority population, but the social and cultural differences necessitated more-targeted action in many fields and the policies of freedom of choice in the cultural realm hindered the governments in actively promoting Scandinavian ways of life.

But how was this profound split pursued in practice in countries where nation-building and welfare-stately formation were so tightly intertwined? How could one exclude or ignore significant new groups of inhabitants from processes that had been seen as essential for the legitimisation of the comprehensive, paternalistic and costly model? This is particularly interesting because the new immigration challenge appeared at the same time as the welfare-state project reached its peak in terms of ideology production, especially in Norway: Norwegian historian Francis Sejersted labels the beginning of the 1970s as the 'happy moment of the welfare state'.^[16] Others also emphasise the ethos of 'fulfillment' in the cultural sphere: The end of the 1960s was seen as 'the natural point of completion' for the grand pedagogical nation-building project that the school system had taken on since 1814, when Norway got its constitution.^[17]

Was it because it was conceived as 'mission impossible', that is, the newcomers were culturally too strange and alienated to warrant the effort? Or was it not necessarily seen from the point of view of the welfare state's nation-builders, because their political legitimacy was secured through the native population?

I believe that a combination of three factors contribute to explaining the phenomenon: the historical context, the lack of political experience, and the 'relative autonomy of ideology'.

When the new immigrants started coming in larger numbers, the states (Denmark and Norway) had little experience handling such a phenomenon, so it was reasonable to approach the newcomers with familiar and presumably efficient means. Including people through equal treatment, social rights and if necessary, targeted policymaking had become the standard tools of welfare governance.[18]

On the *nation* side, the familiar means were not part of any deliberation; they were not consciously mobilized. However, we have been left very little documentation on this. There is a striking lack of reflection in public documents from this initial period on what was later often labeled 'challenges to nationhood and social cohesion', probably because it was *not seen* as a challenge at the time. The welfare-stately nation's self-confidence was high, and besides, nobody knew that immigration was going to escalate significantly in the decades to come. In tune with the general confidence in governance, the state obviously believed that immigration could lend itself to regulation. This was clearly manifested in the 1970s when the 'immigration stops'[19] were implemented: Norway actually introduced the 'stop' as a temporary regulation; one year was believed to be sufficient for getting the immigration housekeeping 'in order'.[20]

So, if the nation were not challenged and the welfare state (and the labour market) took care of the newcomers, new ways of thinking could have had some leeway. By the beginning of the 1970s, new ideologies had already made their impact on Scandinavian politics: As in most Western European countries, a grand wave of political radicalisation swept over society and affected most corners of politics. Most relevant was the eradication of traditional thinking in relation to minorities. The importance of ethnic roots, authentic culture, and self-determination constituted the core of the new philosophy. The *integration* ideology that grew out of this climate was developed at an early stage, particularly in Sweden.[21] Norway and Denmark, following Sweden in matters of multicultural immigration, simply imported most of the ideology from their neighbour.[22]

Recognition versus redistribution

A central area of tension within research on the nexus welfare state/immigration has gradually crystallized around the conceptual dichotomy *redistribution* and *recognition*, as discussed by American social philosopher Nancy Fraser.[23] Redistribution involves attacking socio-economic injustice, exploitation and poverty. Recognition relates to eradicating cultural and symbolic injustice through measures which grant recognition and respect to invisible or discredited practices, groups and identities. Since the 1970s, the three Scandinavian states have wanted to apply both dimensions in tandem, although in slightly different ways and with different emphasis.[24] Gradually, though, Fraser's dimensions have been perceived as conflicting. Over the past two decades it has become evident that the Nordic model's ambitious redistributive goals have not been achieved, particularly for immigrant groups. Low labour-market participation, low income, poor housing, and long-term dependency on public transfers are significantly more pronounced in non-Western immigrant groups than among nationals. This has spurred a debate over the effectiveness of the measures applied to achieve redistribution and the limitation of extending rights to newcomers when aiming for equal citizenship. 'Subsidized isolation' is increasingly viewed as an unforeseen consequence of a too-lenient rights policy. In other words, if the authorities place greater emphasis on the right to be different than on socio-economic equality and if members of minorities take them

at their word and remain in their cultural enclaves, then recognition policy can in practice hinder socio-economic equality. This is the quintessence of the multicultural dilemma, and it is the relation which to the greatest extent, has led to the backlash against multiculturally inspired policies over the past 10 to 20 years: Rights to be different in majorities have been conceived as an excuse among newcomers for not participating in productive work, hence they have increased the need for redistribution through welfare transfers. This, too, has spurred animosity in the native population, challenging the inclusiveness of welfare arrangements towards new members from abroad. In Scandinavia, this development has gone furthest in Denmark, shortest in Sweden.

Gary Freeman was in many ways before his time when, in a much cited 1986 article, he posed a fundamental contradiction between inclusive welfare policies and comprehensive international migration. His main argument was that immigration tends to erode the normative consensus on which generous welfare systems depend. 'When the welfare state is seen as something for "them" paid by "us", its days as a consensual solution to societal problems are numbered' (Freeman, 1986: 62). Robert Kuttner followed suit some 20 years later, with this reference to Denmark: 'If immigrants remain an undigested lump of alien cultures in the midst of a generous welfare state, accepting benefits but rejecting its cultural norms, support for the social system will erode' (2008:93). Kuttner suggests that the well-to-do, believing that they would be better off with fewer social benefits and lower taxes, will consequently move for privatisation.

The tension reflected in these two arguments has gradually come to the fore in Scandinavia, although to different degrees and in different ways. The issue is highly controversial in all three countries, and so far, there are few signs of waning support for the welfare model as such.^[25] But nation-building has definitely re-entered the scene in subtle and more open ways, prompting accusations from part of the public of a resurrection of assimilation policies. The discourse on multiculturalism/integration versus assimilation has been quite confused in the Scandinavian public (as in many other places), lacking analytical clarity and mixing assumptions on *ends*, *means* and *outcome*, thus leaving participants in a schism created by

the question: Is there too much or too little assimilation going on?

On the other hand, the governments are fumbling to find the right means to pursue nation-building in a modern diverse setting. In this matter, the three Scandinavian countries have followed distinct and quite different paths on the ideological and rhetorical side, whereas, I will argue, the *de facto* nation-building through welfare-stately instruments has been intensified in similar manners throughout the region. A common trait is the lack of official reflection as to 'modern nationhood'. The creation of the new *we*, as it is prominently labelled by Norway's minister of foreign affairs, is virtually absent as a dimension in central policy documents on the development of multicultural Norway.

Nation-building governance: which instruments?

The central problem confronting the formerly homogeneous Scandinavian nation-states is how to forge a new or renewed societal foundation to uphold treasured liberal democratic values, universal welfare, and possibly a sense of bounded belonging in a context increasingly featured by people's diverse loyalties and lifestyle preferences. States have a limited number of policy options to deal with this complicated and nebulous challenge. Since the 1990s, *naturalization policies* have been revitalized as one of the instruments in this field, which is located in the intersection between the cultural (nationhood) and socio-political fields (rights to vote and the final full range of social citizenship rights). Although the connection between citizenship legislation and the questions of cohesion, identity and belonging is indistinct and controversial ('identity cannot be legislated', as expressed by Christian Joppke[26]), in practice, a number of states act as if it is worth trying. A detectible division between the policy approaches to this legislation is its relationship to the sphere of *integration*; whether the extension of citizenship to newcomers should serve as a motor in the inclusion process or as a reward for the effort. The three Scandinavian countries can here be placed along a scale signified by the traditional *ethnos/demos* division, both in terms of

what it takes to become a national and as to the conceptions of national identity.

Citizenship law can in many ways be seen as a national presentation of self; what it takes to become naturalized indirectly indicates what it means to be a member of the national community. In the 2000s, the three states have diverged from each other in their legislation on citizenship, but in common, they have all actually made changes to their citizenship law (or Denmark's *regulation apparatus*), partly to make this approach a tool in the integration process. [27]

In this regard, the legislations of Sweden and Denmark differ the most: Sweden's aims to ease a newcomer's way into society as a new citizen; Denmark's to restrict it. Sweden has gone furthest in clearly stating its national ideological platform. Its 2001 new-citizenship law represented an offensive profiling of Sweden as a *demos*-based national state: Cohesion is explicitly stated in Swedish public documents as being based *not* in a common historical background, but in its present affiliation to a state based on democracy and human rights, a state where human value and the Swedish constitution form the framework for the identity of individuals.[28] Becoming a Swedish citizen is one step in an integration process, not a reward for a successfully completed integration. For that reason, Sweden has made dual citizenship possible. The country has a residence requirement of five years, and it has rejected the European trend to introduce language or knowledge requirements to be eligible for citizenship.

The 'rights line' and the few demands are based on the idea that such claims would create *inequality* in access to citizenship.[29] Thus, according to critical voices: A legally established foreigner in Sweden can gain citizenship without knowing much about Swedish history or society, without giving an oath of allegiance, without knowing any Swedish, and in certain cases, without even being able to verify his or her identity.[30]

The Danish 'requirement line' also aims, through legal revisions from 2002 to 2005, to use the naturalisation process as a tool in improving integration. But the idea here is that by requiring participation in courses and educational programmes and passed tests in language and civic knowledge, the authorities will contribute to a process in which it becomes more attractive or, quite simply, absolutely necessary for immigrants to acquire language skills and basic knowledge about their new home country. One can also assume that via the acquisition of knowledge and oaths of allegiance, a process of reflection will take place, one in which new citizens increase their awareness of the normative basis for society as a community. These claims were, nevertheless, part of a number of restrictive changes to its naturalisation practice, in which the residence requirement was raised from seven to nine years, single citizenship was consolidated, and the applicants must not have received social security benefits for more than one of the preceding five years to qualify. Denmark represents the clearest *ethnos* approach in today's Scandinavia.

Norway's revised citizenship legislation is a moderate variant of the Danish solutions: A single citizenship policy was consolidated and the seven-year residence requirement remained unaltered, but the legal position of foreigners has been strengthened in the sense that those fulfilling the conditions for naturalisation have a *right* to Norwegian citizenship. On the other hand, there is now a language and knowledge-of-society requirement, in the form of an obligation to take part in a 600-hour course (formerly 300 hours) with a compulsory knowledge test. Citizenship ceremonies with an oath of allegiance have been introduced, but they are voluntary. Thus, Norway is in a somewhat unclear in-between category. The revision of its law in 2005 can be seen as both a reinforced *ethnos* approach and a liberalization: The wish is to strengthen the Norwegian national identity and shared fundamental values, but there is no concrete definition of what these are or how one would get them. At the same time, the authorities explicitly convey an ambition to extend citizenship to settled newcomers. People *should* become citizens.

The dissimilarities in approaching citizenship policy reflect the integration policies' variation in ideology that have developed in the three countries over several decades. Throughout the whole period, the influence of multicultural thinking has been considerably weaker in Denmark than in Norway and even more so, Sweden. Instead, there is a strong tendency towards negative *culturisation* in the Danish debate, in which the counterproductive influence of culture and religion (for the integration of Muslim immigrants in particular) has been accentuated. This has implied a greater tendency in Danish than in its neighbours for welfare policy to implicitly target cultural or religious groups. In this sense, there are clear signs of group thinking (in a negative sense) in the country that has in fact most strongly rejected the *group* as a unit in integration work. [31] Sweden's authorities have moved in the opposite direction by actively underlining that *only* targeted socio-political measures must be employed for refugees who have just arrived. Preventing the development of an *us and them* attitude has been a main point of the authorities' argument, paradoxically so, because the values of diversity of culture and identity are also given so much attention. 'The national' or 'the Danishness' has been given a far more central position in Denmark than 'the Swedishness' in Sweden or 'the Norwegianness' in Norway. While Denmark's Introductory Act[32] seeks to give foreigners an understanding of the values and norms of its society, the Swedes speak in corresponding documents of respect for democratic, not *Swedish* values.[33] And while the Norwegian and Swedish authorities state that they are 'basically positive as regards cultural, religious and value-related diversity',[34] this type of wording has been omitted from the Danish policy.[35] On the other hand, as Ulf Hedetoft points out, when Danes are asked to define what is meant by this so highly rated 'Danishness', they refer—as do the Swedes and Norwegians—to internationally recognised values such as human rights and democracy.[36] Consequently, *demos-values* are seen in Denmark as *Danish*,[37] thus being used exclusionarily in relation to immigrants (especially Muslims who are not seen to share these values).

The welfare state anyway?

Similarities in post-1970s Scandinavian immigration policies can be summarised as

follows:[38] Changing governments have, after the 'stops' of the 1970s, continued to use the basic structure of immigration regulation, that is, a combination of a selective, strict regulation of influx and a generous (by international standards) rights policy for legally established immigrants and for asylum seekers being processed. The concept *bounded universalism*[39] can be applied to this basic structure. Generally speaking, all three countries have maintained the universalistic organisation of the welfare state, regarding both the large coverage area of the welfare arrangements and the high priority given to general measures and sectoral responsibility in dealing with the new immigration, even though recently arrived immigrants have also been the object of a number of special measures. Throughout the period, the welfare state has continued to be a strong premise-giver for policy development within the field of immigration. Only Sweden introduced (for a limited period) an official multiculturalism which explicitly assumed responsibility for protecting immigrants as ethnic minority groups. But all three countries are, like most liberal states, exponents of a *de facto* multiculturalism[40] in which cultural minorities can find protection through individual rights and in which adaptations to the cultural and religious needs of minorities are carried out on a more pragmatic basis. Furthermore, the *workline* has had an increasing impact on integration policy. All three countries have introduced full-time qualifying programs that combine language teaching and job training, and stronger links have been made between active participation and income support. The obligatory aspect of welfare schemes has been strengthened. Although the three countries have different formal affiliations to the EU, each has had the freedom of action enjoyed by its government strongly limited by EU policy within the field of immigration. And over the past ten years, the contours of a *dualistic* immigration policy can be seen in all three countries: Relatively separate systems have been established for labour immigration and humanitarian immigration (even though this division has become less rigid in Sweden). Since the turn of the century, the authorities have tried to attract qualified foreign labour, whilst wishing to limit the influx of other groups.

As to the substantial and ideological differences among the three states, for a long time they seemed to be 'differences of degree' over the same basic concepts. When, after the turn of the century more striking disparities, especially between Sweden and Denmark, became noticeable, we see that these derive from discrepancies that stretch back in time. The

'differences of degree' pattern also means that along certain axes both similarities and differences exist, depending on what one chooses to emphasise. Even though we can conclude that all three countries have been influenced by multicultural thinking, there can be no doubt that this has had the greatest impact in Sweden[41] and the weakest in Denmark. In balancing obligations and rights, the obligations of newcomers have been emphasised more strongly in Denmark and Norway than in Sweden. And in stressing that all three countries have actively supported the workline policy since the 1990s, we can see that it has been implemented to differing degrees and in different ways in each country. All three states have sought to tighten family immigration and the influx of asylum seekers, but Denmark's legislation has gone the furthest.

Considering symbolically charged issues and the development of ideology, the differences have grown beyond mere differences of degree. Denmark and Sweden explicitly justify their integration policies in different ways and describe the 'end product' in different terms. Public discourse on such topics has also assumed very different forms. Norway, in this respect, has developed from most resembling Sweden to more resembling Denmark. The national narratives concerning the new multicultural society have become more clear, but more unlike each other during the period under discussion.

Consequently, on the surface there are now distinct ideological discrepancies within this policy area in Scandinavia. Just how important the differences are in practice is another matter. The effect of citizenship policy on integration has not been mapped in any convincing way, and all three countries still offer their new (legal) residents considerable denizen rights (social rights as well as civic and certain political rights) without formal citizenship. If one takes a somewhat closer look at the respective ideologies, the contrasts between them also tend to fade. According to Ulf Hedetoft, there is 'well hidden behind the Danish idea of assimilation a growing acknowledgment of the fact that the global challenge calls for more "diversified leadership" in companies, a greater openness towards and recognition of minorities, and a more flexible immigration regime'.[42] In Sweden, on the other hand, the liberal *demos* approach has not vaccinated the country against a decline in tolerance, racism,

ethnic segmentation or weakened common values, strikingly revealed in the 2014 election, where the rightist party *Sverigedemokratene* became the third biggest party in the country. A few years ago, a book was published with the striking title *The Citizen Who Disappeared*^[43] and Swedish 'model identity' is ironically commented on in the title of a book on Swedish racism: *Even in Sweden*.^[44]

Despite all this, the Scandinavian countries are today *de facto* multicultural societies in the middle of a redefining process: They have had—and constantly have—to create new narratives about national identity and the objectives for a good society. These are tension-filled processes. The new multicultural narratives are an attempt to resist pressure against the national understanding of cohesion and solidarity, where one tries to disarm difficult cultural differences. At the same time, unavoidably, the cultivation of diversity reifies the very same differences. Cultural differences gain lasting importance in the great equality project of the welfare society by ensuring that groups have representation and political recognition. The new nation-building project becomes a paradox. The problem (by definition) arises *because* people bring their national and cultural identities from their respective home countries: The traditional nation-building project of the majority loses legitimacy because newcomers have the legitimate right to maintain the product of *their* own (ethnic or national) identity projects. Dual citizenship confirms the importance of national identity; the difference is that one is allowed to have two identities instead of one.

The Danish authorities have tried to avoid these contradictions by defining Danishness as the governing principle, but they are caught up by reality in important ways. First, Denmark has international human-rights obligations that protect people's cultural rights to a certain extent. And second, Danish society is also subject to changes that cannot be easily controlled politically. Society changes slowly and imperceptibly when thousands of newcomers settle each year and make their mark on their surroundings. 'Danish values and premises' can be used for part of the process, but in the long term it cannot withstand the pressure of time. In Sweden, where public debate on multicultural problems has been more cautious, or even taboo, conflicts have surfaced more often in recent years, although in a more suppressed

form than in Denmark. Often-harsh condemnation of critical aspects of multicultural Sweden has contributed to repressing frustrations and criticism to more-private contexts. In the long term, this can find expression in clashes between the public elite and the rest of the population, with unclear consequences for social cohesion. Both the Danish and Swedish strategies towards ethnic diversity can be said to have an authoritarian tinge, or at least a top-down attitude. Sweden wants to instruct its population (first and foremost, the majority) in tolerance. But the Swedish position also attempts to urge people towards national solidarity and pride based on liberal and democratic values. The Danish position is more instructive towards minorities and newcomers, while it urges the majority to maintain its cultural heritage. The Norwegian approach is the most confusing, if one is in search of authoritative instructions: Norway's authorities want both a consolidated national heritage *and* support of *demos* values.

Bounded welfare nations

The welfare state has been one of the most powerful institutional sources of legitimacy for politicians in the Nordic countries after the Second World War both in terms of constituting nationhood and as a vehicle for economic redistribution. Thus preservation and protection of the welfare state has been important whenever the pressures of internationalisation and globalisation have made themselves felt.

According to a Norwegian expression, everyone potentially has a straw into the state budget, that is, everyone has claims on the state and it is the state that gets the blame when things go wrong. The state is supposed to protect immigrants from pressure within the majority to assimilate, yet when the state succeeds in this endeavour it gets the project in return as accusations of *failed integration*.^[45] The ideology of integration implies a good portion of liberality towards minorities in their endeavour to maintain their original culture. At the same time, the state should beware that *difference* does not become a barrier when rights and

benefits are allocated.

In all of Scandinavia, the welfare state was from the beginning the self-evident instrument for incorporating newcomers. Gradually, this instrument has become more controversial, in parallel with the general processes of social reform, in which restructuring policies has been regarded as necessary to avoid dependency traps and 'overconsumption'. The three states are torn by dilemmas and competing moral imperatives and have neither the answers nor the means to handle many of the problems. Today, the state has to balance national values, human rights and *realpolitik* in complicated ways and in a field that does not lend itself easily to governance in the first place. Nationhood in Scandinavia is still strongly embedded in social institutions. Ironically, freedom of choice, which constituted a key principle when integration policy was introduced in Scandinavia, has gradually conquered most social-policy fields. Deregulation, privatisation, flexibility and freedom of choice have become the contemporary response to restructuring the welfare state. At the same time, the authorities in all three countries have successively sought to *restrict* the free space available for the diverging life projects of the newcomers. This has most clearly been seen within the fields of gender relations and the family. Issues such as genital mutilation and forced marriages have placed the question of state intervention into the private sphere on the agenda for the immigrant population. Immigration policy has increasingly displayed an ambition to actively intervene in the behaviour and attitudes of the minority population, whether by dialogue projects, information, or law reform and intervention.

Even if we have not witnessed a new generation of 'interior decorators of the People's Home', immigration policy has increasingly demonstrated a belief in the opportunities inherent in education, information and normative legislation to change people's behaviour and attitudes. Newcomers should be *enhanced* and *helped*, yet also *formed* and *cultured*. The professions of the welfare state have consistently had a complicated or unclear relationship with people who have essentially different sets of values and who have not participated in the socialization processes of social democracy. Nevertheless, inclusion has been turned into a political and moral imperative—a necessary continuation of the large integration project that

was conducted under the banner of 'do your duty, claim your rights'.

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[1] The incorporation of workers and peasants into the grand welfare project.

[2] Stråth 2005.

[3] Ibid: p. 35

[4] Ibid.

[5] See Hagelund and Brochmann 2009.

[6] The politics of "Norwegianization" (as it was referred to in Norway) included cultural, linguistic, educational and religious "normalization" of the Saami minority in particular.

[7] Lofgren 1999: 54.

[8] This term refers to immigrants from countries outside of the OECD.

[9] See Brochmann and Hagelund 2012.

[10] Esping-Andersen 1990.

[11] Gür 1996

[12] Quoted in Hirdman 2000: 123.

[13] Gür 1996; Borevi 2002.

[14] Brochmann and Kjeldstadli 2008.

[15] Tjelmeland, Hallvard and Grete Brochmann. 2003. «I globaliseringens tid 1940-2000». I: Knut Kjeldstadli, red., *Norsk innvandringshistorie bd III*. Oslo: Pax.

[16] Sejersted, Francis. 2011. *The Age of Social Democracy. Norway and Sweden in the Twentieth Century*. Princeton: Princeton University Press.

[17] Lorentzen, Svein. 2005. *Ja, vi elsker. Skolebøkene som nasjonsbyggere 1814-2000*. Oslo: Abstrakt forlag: 227.

[18] For a more extensive documentation of this initial period in modern immigration policy making in Norway, see Brochmann, Grete and Knut Kjeldstadli. 2008. *A history of Immigration. The case of Norway 900-2000*. Oslo: Universitetsforlaget.

[19] Restrictive immigration regulation introduced in all three countries in the beginning of the 1970s

[20] Brochmann, Grete. 2003. «I globaliseringens tid 1940-2000, Del II». I: Knut Kjeldstadli, red., *Norsk innvandringshistorie, Bd III*, s. 137-387. Oslo: Pax.

[21] Sweden had the ambition after WWII to become a “world champion of human rights” (Borevi 2010).

[22] This was more the case in Norway than in Denmark. See Brochmann and Hagelund 2010.

[23] Fraser 1997.

[24] One may claim that in Scandinavia prevalent policy has been more a combination of “politics of redistribution” combined with “politics of integration” more than “recognition” in terms of actual cultural group rights (Seland 2011).

[25] There are, however, signs that indicate that parts of the population want a differentiated welfare state with restrictions on newcomers’ access to social rights. This has been most pronounced in Denmark.

[26] Joppke 2008: 536.

[27] The principles of *ius sanguinis* and *ius domicilis* coexist in Scandinavian legislation. Since 1950, national legislation has been partly or completely revised in all three countries. Sweden began a total revision in 1997 and completed the work by passing a new bill in 2001. Norway followed in 1999, passing its final bill in the fall of 2005. Denmark has had no complete revision of the 1950 Act, but a succession of alterations and supplements has changed the original content to a considerable degree. See Brochmann and Hagelund 2012; Midtbøen 2009.

[28] SOU 1996: 55.

[29] Borevi 2012.

[30] Björkman, Elferson, Friedman & Wedin 2005: 130.

[31] Jønsson and Petersen 2012.

[32] Similar legislation in all three countries: A program to facilitate integration through training and education for newcomers.

[33] Holm 2007: 189.

[34] White Paper no .49 (2003–2004): 10.

[35] Holm 2007: 189.

[36] Hedetoft 2006: 396.

[37] Mouridsen 2006.

[38] Brochmann and Hagelund 2012.

[39] Benhabib 2002.

[40] Joppke & Morawska 2002.

[41] Although this course was adjusted earliest in Sweden where it was oriented more in the direction of 'diversity ideology' and of a greater emphasis on individuals.

[42] Hedetoft 2006: 392.

[43] Rosenberg 1993.

[44] Pred 2000.

[45] In Norway there have been examples of students with immigrant backgrounds intending to sue the state for their deficient Norwegian language skills. Their claim is that having being placed in special classes for students with limited knowledge of Norwegian (targeted policy) has retarded their learning process.